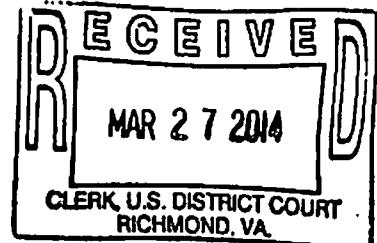


United States District Court
Eastern District of Virginia
Richmond Division

Kim L Franklin
2601 The Terrace
Richmond Virginia 23222



v.

Case Number: 3:14 CV 218

City Of Richmond
Dwight C. Jones, Mayor
Charles R. Samuels, President of Council
Stephen Hollifield, I.S. Manager City of Richmond Police

Complaint

The Plaintiff Kim L. Franklin , is a resident of the City of Richmond and State of Virginia. The Defendant, The City of Richmond, Dwight C. Jones :Mayor , Charles R. Samuels : President Of City Council, Stephen Hollifield, I.S. Manager City of Richmond are officers and Stephen Hollifield an employees of the City of Richmond, exist under the laws of the state of Virginia. This is a question of the application of the 14th amendment and constitutionality of actions taken by the Defendant. The court has Jurisdiction over these actions under 28 USC §1331,28 USC §1332,1338, 1367gives the court authority and power to hear and make determinations on this case.

Facts Of The Case

1. On October 1, 2013 I was hired by Jason Vanata District Manager. Tom Davis Store Manager ,with approval of Tom Murphy Regional VP. Tom Davis was unable to hire me upon my initial interview until he was able to get approval. Initially I requested to be an assistant manager. But upon conferring with Jason and Tom Murphy, Tom Davis explained he was new to this kind of process as he had worked in different kind of retail environment. I was hired as a full time lead at Dollar General not assistant manager.
2. As a full time lead, I was responsible for opening and closing of the store and monitoring stock levels and security cameras in the store for possible shrinkage opportunities. Whether through our receiving process employee theft or shoplifting one of my core responsibilities is to manage inventory levels.
3. After working approximately two weeks I was given keys and had to use my Store Manager Tom Davis alarm code. I have 10 years of previous management experience in retail a manager should never use another managers alarm code, or know someone else alarm code. Now it would look as if each night I was using someone else s code but not my own.
4. November 2013, I began to see odd behavior and blatant failures from a policy stand point. There were consistent attempts by all the employees Stephen Tyler, Jasmine , Gloria Davis aka Paulette Davis, Tom Davis, Antoinette Troy aka Antoinette Campbell, Da Jah Moses, Lawrence Hicks, get my password . Used random number generator to alter my password from that point. I began to believe Tom Davis was stealing cigarettes at this time. Based on His actions of routinely leaving doors unlocked and not presenting himself when leaving in consistent manner..
5. I was only allowed to complete 4 of 23 my Computer Based Learning test, CBL These test would have familiarized me with Dollar General Policy. Later I learned this was an intentional act to keep me from knowing how to look at data. Brought this to attention of District Manager Jason Vanata. I was offered a ride during a store closing by Antoinette Troy on early January 2014.I enjoyed walking home and I did not feel comfortable around her. I was later asked by my Store Manger Tom Davis on a day we closed together he asked me about my financial situation and if I needed extra hours at work. I told him I was OK. He asked me what does OK mean? I replied that I was content and would be content living under a bridge and money did not concern me. We talked about my Buddhist beliefs and I left his vehicle.
6. Receiving doors, fire alarm doors consistently left open in month of January 2014 by Tom Davis. Previously in Air Force worked in various Launch Facilities. Used training to disrupt what I felt in December 2013 was major Robbery. I was being set up to take blame for some robbery or theft in the store.
7. On the week of January 12, 2014. I noticed that Antoinette Troy had put in for a vacation for January 19th-22nd 2014 it was quick and abrupt. Prior to that date I had informed Kevin Heflerman that I believed something was going to happen and it was major. We talked briefly and I explained the unlocked receiving door and fire alarm door each night by Tom Davis as he was the only manager with a key. I told him he was stealing and I thought it was cigarettes.

8. On the week of January 20th I notice Da Jah Moses was scheduled to leave early at 7:45pm on January 20th on the weekly schedule. That seemed odd to me and I began to realize that my thoughts on store being robbed were true. She would leave early on that day and it would just be me at the register managing customers Lawrence Hicks working the freight as well as Jasmine. Tom was made aware of this , he asked Da Jah Moses to stay until 8:00pm on January 20th.
9. I was unable to figure out why rob the store we only made on our best days \$3,000 and average \$2,500. If they were to take all the cigarettes and sell them at a premium the most they could get would be \$30,000. I was seeing faces through out the week that were not familiar to me some with new york accents and black males with tear drops tattooed on there face below the eye. The Manpower I asked Da Jah Moses and Lawrence Hicks why they thought someone would want to rob the store, they gave no reply.
10. On January 20th I worked the evening shift. Tom Davis, Stephen Tyler Antoinette Hicks, were not scheduled on that day. As I clocked in and began to prepare for the day I was working on register 3 as it gave me a peripheral view of store , Da Jah Moses was on register one which faced the front door and was a primary register to stay in compliance with American With Disabilities Act. At approximately 2pm Da Ajah first transaction upon getting her register was to break a \$100 dollar bill I went to the safe broke the \$100 bill gave customer change. This was unusual for an associate receiving a \$100 bill on first transaction is remote. But this was a \$100 bill from a customer who I did not recognize, and saw the three customers behind him as not recognizable. I opened the safe broke down the \$100 bill and gave customer change. Later when I looked at the video she seemed nervous. I began to worry at this point.
11. On January 20th at approximately 3pm I began to notice customer traffic was abnormal the customers I would normally see I did not see on that Friday they had New York accents and very few southern accents some had the tear drops on there eyes. I felt a deep discomfort as if I was in a play. Everyone seemed to have a role, it did not feel or look like a retail environment the customers seemed to be waiting for something. There were 3 transactions that gave me alarm bells and caused me confusion. I had a heavy set African American female light complexion do two Green Dots(debit card) for \$120, followed by another \$120 on two separate Green Dots(debit card) by African American female dark complexion, the sister of a former employee, Marquise who was later terminated a few days after the failed attempt on January 20th. In both cases Green Dots(debit card) ,I put the money under register to eliminate the opportunity for theft or smash and grab.
12. On January 20th 2013 at 5pm a customer who was a normal customer walked up to me and stated "*I did not know if you were open , the parking lot was empty*". I immediately walked out to the Parking Lot of Dollar General there were Three cars where normal traffic would have the lot half full during this time. I turned back and saw Da Jah Moses on her cell but did not investigate why she was on her phone while customers were in front of her. Not one customer voiced a complaint or concern while she was on the phone and they were waiting and many were customers I had not seen before.
13. At 6:30pm Traffic began to pick up in the store I knew that if the store were to get robbed based on historical patterns and information provided by Antoinette Troy that if the store were going to get robbed it would be at 7:30pm 30 minutes before closing.

14. I began routinely walking outside the store looking into the parking lot trying to be disruptive to anyone planning to rob the store. By this time I was certain the robbers were coming. I looked into the parking lot trying to identify the vehicles in the lot. Each time as I returned back to the store Da Jah Moses was talking on her cell phone. Between the times of 6:30pm an 6:40pm I noticed a car had parked in the no parking area, it was a blind spot area so I knew I could not get accurate picture of who vehicle but as I viewed the vehicle from the rear I could see that it was a black Buick new possibly a Lacrosse. There was a black male on the phone as I looked back I could see Da Jah on the phone. On the passenger side there was a white female mid length hair.
15. The White female would not turn towards me and the black male kept his face forward. As she began to slouch down I could see more of him and could see he was on the phone with someone. At about 6:45pm a black impala pulled up on the the West Essex street side of Dollar General there were two black males sitting in the car they did not get out at the time for a few minutes as I was standing by the door. As I returned to my counter a long line formed with some customers left me feeling like they were reading a script of a play. Then two individuals walked into the store. One was a heavy set black male dark complexion about 5'7" the other 6'2" long hair looked of Spanish descent and I had not seen him in the store previously. The 6'2" gentleman walked immediately to wards back of store but glanced over at me. He seemed stressed the heavy set black male remained in the front of the store both were wearing ties.
16. I had a heavy set black female in front of me I was constantly being distracted by Da Jah Moses and I knew what she was doing I asked the lady at register three my counter to excuse me. She told me to "do what I had to do", as I had the store hardline phone to my ear calling 911. As I described the situation to 911 operator she said help would be on the way, at that time two minutes after putting phone down officer Lane of 4th precinct walks in the Short Heavy set black guy had already left the building. The 6'2" black male walked past officer lane and he proceeded to follow him out the store. Officer lane informed me of what happened afterward.
17. Officer Lane stated on 1/20/2014 at approximately 8:15pm that he saw vehicle leave parking lot and pick up 6'2" on the other side on North ave. He stated he had the license number and was calling it in. Later officer lane stated the black impala belong to someone Overbrook road and that they were looking into it. No report of suspicious person was taken I saw no detective and no one wanted to even see the film in reference to the event on December 20th2013. I contacted my store manager. Tom Davis called me back informing me he had contacted Kevin Heffernan it was 8:30pm. At this point believed both Tom and Kevin were involved. I called Kevin on my cell phone. informed Kevin called him on my cell phone, he stated he was watching me at approximately 9:00pm count the money to place in the safe. I asked him did Tom Call You or you call him, he said he could not discuss that with me. And wanted me to quickly count the money and leave he said a detective was outside.

18. On the January 20th 2014, at approximately 9:45pm, I exited the store. Da Jah Moses and Jasmine left the store together when Jasmines mother came to pick her up. I normally take Essex street to Fendall ave to go home. This night as I was walking I thought it prudent to take a different route so instead of going up Fendall I turned up on Garland. I did not know where Da Jah and her boyfriend Wayne lived. As I walked I saw Da Jah Moses walking up the steps and her boyfriend yelling at her, "I told you it was going down today I told you". She hung her head down and proceeded to walk in the house on Garland I stopped for a moment as I had some certainty that whatever conspiracy that was occurring was within the store. It was an Inside Job.
19. On the Monday January 23rd I called the 4th precinct looking for a detective. As I was told by Kevin they were going to be there the 21st the next day to come to out on Monday. Kevin Heffernan had told me on the December 20th he was also going to be there on Monday. No one showed so I called 4th precinct was given several numbers and left a message to have the 4th precinct detective call me back. I never got a call back.
20. On Monday the 23rd I called 911 and informed them no report of any kind was taken, six officers response none would take a report, not even for suspicious person. I had previously finished the police academy and knew something was wrong as an air force SP I sometimes performed law enforcement duties during Nuclear convoys. Any incident was recorded. The same principles were applied in the Richmond Police academy, at a minimum a description height weight gender of the individual must be taken and report labeled as suspicious person. In my case this did not occur. With the exception of two anomalous situations.
21. On January 23rd after talking with the six officers from the 4th precinct and no report given, they said I should talk to my corporate Loss Prevention which for my district was Kevin Hesfnerman. When I called him he asked who I was and what I was talking about as far as the incident. And said nothing happened "you saw two strange black males who were possibly shoplifters, who got scared off and ran leaving in a black Impala. The Problem was I never mentioned a Black Impala to him and if he was given this information by an officer the officers at a minimum had taken some information. And had some duty to take a police report from me on what happened. We yelled over the cell phone for a few minutes, I told him it was an inside job, he told me we do not investigate employees. It was someone maybe shoplifting and I was not an Investigator.
22. This was an anomalous behavior in all my time in retail I had never seen this. Never had I seen a lost Prevention Manager not want a case. On that same day he conference in Jason Vanata. Jason repeated the same mantra that we do not investigate employees. I was not going to be denied that which every citizen gets equal protection under the law. Guaranteed by the 14th amendment. I called officers out again and told them I wanted to report an incident and give a description of the events that occurred and a description of the individuals. In the event they returned or there was some pattern both officers refused and said I should go to my corporate office to have them investigate.
23. On the same day again I asked a detective come out to take a report, this was detective Higgins of 4th precinct who responded it was about 8:15pm as I explained the situation to him he did not take a report either. I told him I had overheard something but did not know who to trust and would not trust him. As we walked to the front exit two black males came walking up to the reviving door. They were wearing all black and thought the receiving door would be unlocked. It was not as Tom Davis has the only key to the reviving door and no one else. I walked the perimeter and found it unlocked as it had been on several previous occasions and locked it that evening.

24. After pointing to the two men, detective Higgins told me to get back in the store. I was angry and yelled at him, that I had to lock the receiving door almost every night that I worked. He needed to take a report. He not only did not take a report and did not call police to apprehend the individuals. Not one police car was outside to take a report that I saw two individuals trying to break in the receiving door. They through up there hands in disgust as the door was locked by me. Detective Higgins tried to tell me they looked like they came out of the corner they did not. In the conversation that follow that night the neither confirmed or denied the incident. This was frustration I had seen officers detectives for this incident and 8 other incidents that followed and still No police report.
25. Detective Higgins met me on Lancaster as I was heading home, I did not know who to trust so I asked him to go to battery park and I would talk to him there. When I arrived I told him about what I had saw Da Jah Moses walking up the steps and her boyfriend yelling at her, "I told you it was going down today, I told you". She hung her head down and proceeded to walk in the house .Detective Higgins upon hearing this looked to the ground for a few seconds and then looked off liked he was sick, I did not know why. This is when that I had seen police officers walk past individuals who were hooded inside the store. They would not detain check ID of the individual later I found that they were gang members and the police already knew who they were. I have never had an occasion in my 47 years where an officer had approached me and not ask for my ID.
26. In the following week, there was one individual who came in the store twice he had a jean jacket that had several different kinds of patches his pants were rolled up and he was wearing a pair of low cut "Chuck Taylor . I believed him to either be the one of the people in the store or the individual in the black Buick. I could only see the individual from the back but the silhouettes matched but I could not be sure. As the week continued he came back in the store similar outfit but I was at register 1 this time and his head was not down as he had walked in the store previously.
27. Initially I thought him to be crazy as each time I turned and looked up at him he was staring but later I realized he was trying to see if I could ID him for something. But since I could not, I saw his behavior as odd he had a Goatee ,Black male 5'7" short hair cut , a hard oval shaped head. In the later part of January I was approached in the store by two gang members it was snowing that day but I knew they were at the store for a pick up of something. Called 911 again. Still no report given on that day or following day when I called again. On 1/30/2014 Detective Higgins stated he had talked to his sergeant and he could not investigate and I should take this to my corporate office. This was a continued refusal to acknowledge my rights under the 14th amendment.
27. At this point I contacted many agencies Local and Federal with only the FBI and secret service willing to hear my story. When contacted the FBI i was told by someone to call back tomorrow tell the person who answers you wanted to be transferred to gang unit duty agent. I did not get a name from the agent only that after I gave him the information I gave him specific answered to the best of my ability as again the day before as stated in 27, a black Male about 5'6" and White male about 6' came into the store both wore black. The black male had 3 teardrops under his right eye the white male had none but hid most of his face as he walked around. I called the police as I had on several times before no report was taken. Or a description taken down and I did not get again a report number for suspicious person.

28. The FBI officer thanked me and no particular report was taken I did not get a name even a fake one. I was only told if I am contacted it will be on my cell phone. I was not sure why but as the days followed I never heard from the FBI and made repeated calls and no one knew who I was finally on march 1st after I was warned that the individuals coming were going to kill me. I spoke with Tom at the FBI. At that point I knew I was on my own I was sad depressed and disheartened. As even when someone conspires to kill you and you contact a federal agency, they have also been compromised. And could not afford me the same protections they would give to the gangs and other Citizens.
29. As a student of political science art and philosophy at VCU there was no thought I could now think of that would help me know what I would do next. I cried when I thought about it that my state and government had been compromised in such a way. I had no protection from City , State or Federal government. I was on my own it hurt to know the protection afforded to a gang could not be afforded to me as a citizen. A registered voter, voting in almost every election, had lost his citizenship my 14th amendment rights to a De facto unelected government in these Gangs. I had no 14th amendment rights that the Richmond Police, FBI or State police had a duty to protect as I am still on my own. But I am I am specifically asking that the City of Richmond honor and extend the equal protection guaranteed in the 14th amendment.
30. I had learned how Richmond Police as well as some State Police were involved in what I believed was the smuggling of cigarettes. I later found it to also be a place for counterfeit currency. The key question for me was how were the police able to get away with this undetected? By committing certain data put in to the SPSS Clementine predictor model used by Richmond Police. As I continued to watch the actions of certain officers on the video feed it was blatant and obvious that some agreements had been made between the gangs and Richmond Police Officers.
31. By omitting suspicious person reports and alerting drug dealers when a 911 call is place they were able to show that activity on the 29 block of north ave was consistently showing that activity there was statistically Insignificant. SPSS data, the Richmond Police could alter the output of the Clementine SPSS Predictor Model by committing or preempting (alert drug dealers) certain inputs. The SPSS is a multivariate linear regression model that creates relationships between one event and another. I have underlined create in this instance so that one does not construe any statistical model without inherent biases. Mainly the influence and nature of subjectivity on model results.
32. This model though multivariate is based on contingent probability as follows. $P(B/C) > P(B/\neg C)$ or $P(B/C) > P(B)$ both are equivalent. When these conditions persist we have a positive correlation when they do not have have a negative correlation. Once data is moved into a probability, algorithm or construct. It becomes a physical event bound by the Causal Environment that is created.
33. But it must be distinguished that a physical event persist if and only if, the moving of mental causation which is relative, into a construct, algorithm or probability or (CAP). Mental Causation + Causal Environment. but Causal Environment = Construct, Algorithm or Probability, etc...If we seek a causal environment Mental Causation + CAP = Physical Event and how a physical event occurs we must without exception take a mental experience and make it physical. From this we arrive at a statistics and linear regression and predictor models. Such as the SPSS Clementine System.

34. There are several conditions that must be present that make a predictor model possible.
 - a. All causation is temporally contingent.
 - b. That which temporally contingent is relative. *Example: Time Dilation, Einstein Relativity.*
 - c. That which is relative is comparable.
 - d. That which is comparable is a perception or belief and sensory dependent.
 - e. As no physical event can be interpreted absent the senses, perception or belief.
 - f. And mental causation is based on perception belief and data interpreted by the senses.
 - g. There can be no physical causation.
35. There is one exception to this and that is through the creation of causal environment, an algorithm, a construct ,probability or SPSS predictor model used by the Richmond Police. A predictor model takes the relative nature of mental causation and places into a creates a physical event where none existed. Example: (smoking leads to cancer) even though its a general statement it implies causation where none exist. If you smoke you might catch cancer or you might not and even if you did there could be a whole host of other variable to consider before making the determination that smoking causes cancer. The individual could have worked in a nuclear power plant and was exposed to a significant amount of radiation. Or indulges in carcinogenic foods. This is the mental aspect of causation, it is subjective prone to perceptions and beliefs and the water tressed, should be tressed carefully as you will see it was a component which robs citizens of the 14th amendment rights.
36. Once we move from this mental causation we create the causal environment and the construct where the Predictor is born from ie; correlation not causation. Here we revisit the contingent probability once used can create the probability $P(B/C) > P(B/\sim C)$ or $P(B/C) > P(B)$ where B=smokers C=cancer. It must be emphasized that this inequality does not say if you smoke you will catch cancer but smoking creates a higher risk of catching cancer and no more than that. This is the very nature of probability you take an event that falls within the realm of mental causation and create a physical construct algorithm or predictor model.
37. Now what if we change B=Suspicious person report/Alcohol Use C=Drug Arrest $P(B/C) > P(B/\sim C)$ or $P(B/C) > P(B)$. Re-stated the probability of a drug arrest given alcohol use and suspicious person report, must be greater than the probability of suspicious person report and alcohol use not leading to a drug arrest. The Target of the Richmond police that led to the intentional deprivation of 14th amendment rights is $P(B/C)$ if this number is lowered the equation gets began to get smaller reducing its statistical significance. The amount of drug arrest is conditional upon the the amount of suspicious person reports and alcohol use reports. Now we have an algorithm that which is physical and can can accurately interpreted where the problems are in the city. But as is well established any model can be manipulated to give a desired outcome.
38. But what if police refused to write reports on 911 calls for suspicious person. That area will not warrant extra city police resources. Since 1985 there have only been 23 arrest for drugs on the 2900 block which would yield to approximately .75 arrest each year. But on correlating streets the amount of drug related arrest on Lancaster, Brooklyn park boulevard and Fendall Lancaster dwarfs that number. The Dollar General is a Front for some kind of trafficking up and down east coast and sometimes Texas. The officers do not write reports as Dollar General store there is a Hub for the drop off where is picked up by various distributors. Richmond is close to I95 which gives quick access to the highway. As long as the officers omitted data in the SPSS Clementine system anyone calling 911 would not get a report even if there was a incident as it relates to the 2900 block of North Ave.

39. once the illicit merchandise reaches Dollar General the police, take over along with Gangs and the executive branch of Mayor Dwight Jones Administration.
40. The police were denying me equal protection to maintain some illicit activity within Dollar General and had no intention of allowing myself or anyone else to write a report on anything that happened on the 2900 block of North Ave. The predictor model is vulnerable to this manipulation without constant quality control and resetting of parameters. The officers in denying me equal protection were trying to paint a picture on paper that did not reflect the open air drug market on North Ave and many other places in the city. Each time someone called for whatever reason if it involved the gangs the police were protecting no report could be given. The ratio of 911 calls to police reports is distorted and with the courts patience ,I will show how the variety of ratios used can reveal a massive amount of discrepancies. The Defendants actions and manipulation of data and police action was part of the vehicle used to deny me of my 14th amendment rights.
41. At this point I had a model for how things were working but began to notice that because of my vigilance officers began making shopping more than often in the store. At this time when I worked day evening or night I would continuously get barrages. Jane Doe informed me that Antoinette Troy kept track of the Richmond data and had police protection, and I could not ask her or say anything to her. Jane Doe acknowledged only that it was not cigarettes that were being smuggled by dollar general or the police but did not give specifics. And warned me that I should leave. I made a last ditch effort as a group of young people came in to make a pick up. I called 911 and said robbery was taking place, the police came followed the vehicle, again no report not even a recognition. That a potential robbery or there were 5 individuals in a blue car. Nothing on who they were or if made a mistake or why I even thought they were robbing the store. Nothing. At this time lieutenant Mills would stop by on his bike he wanted to talk but I didn't trust officers at this point.
42. By this time I began tracking officers coming in and out of the store and had realized that even though Jane Doe informed me that I had escaped death a few times. The police and gang members were not happy. In two of the attempts they were to rob the store and if necessary Kill me. Antoinette along with a minor group wanted me dead she was frustrated as they needed to make delivery on merchandise and I was preventing that from happening. I explained to Jane Doe that these groups are not the state ie: *having a monopoly on the use of force*, and the police are here to protect citizens from gangs not the way you are seeing it. But because of money the Gangs had become the De facto state in Richmond.
43. I was threatened by one of the previous suspicious individuals who cased the store he held his finger out and act as if it was a gun I went to the door asked him what he said. I angry he ran across the street. John Doe informed me that they would not harm me when he was there. And acknowledged that the officers call drug dealers and robbers to let them know when I am calling.
44. On January 25th There was another incident in the store, called 911 did not call Tom Until after event same thing as before individual allowed to walk by the white male and female office let the very small black male walk by with a hood on his head and pajamas. I walked outside and pointed him out to no avail.
45. January 30th called 4th precinct last time I talked to Higgins. Forwarded the information I gave him to his Sgt. He said his Sgt said it was a corporate issue and he could not investigate. Again I knew from my Richmond Police Academy experience that this could be investigated by police. And had experienced it after 10 years at Lowe's, 3 years at Target and 2 years at Kmart .

46. 2/4/2014 Jane Doe and I talked I wanted her to talk to someone and get protection for herself and family. Suggest operational Staff of Richmond Police Force. she looked at me and walked away shaking her head. As if I had no clew what was going on. I ask Jane doc why did Antoinette have so much protection, Jane Doe "She did not like it but she has all the data." "Also stated brag about President: Barack Obama visit while campaigning for Democrats and "having people 10 feet from the president," I told her about the secret service perimeter, and how secret service keeps a perimeter around the president. I assumed she was talking about police and still do as she would not clarify her statement. Her reply " they did not say police" to her. Jane Doc said " If any of those involved go to any police agency they will kill us because everyone knows to much. I told her "I go to police all the time" her response "but you don't know anything" was her response. I was still thinking it was the smuggling of illegal cigarettes.

47. 2/21/2014 Another suspicious person event occurred , female cased store while two males waited up front. Recognized the face of all three. Found out the name of the female. Linda aka: link was her name. I could not even get officers who liked me to help me even though I had a name. Steven Tyler an employee of Dollar General of what was going on and asked him if he knew about the robberies he said no. Told of Marshall and ATF were on roof, needed to see who he would call , text officer Drake. She had a brief but silent discussion with him and left.

48. 2/22 Looking at blue book to note time and dates officers came in store and what they did in store. They were coming in the store but going in blind spots, there shoulder movement indicated they were taking something out of a package. Some where male officers browsing female hosiery.

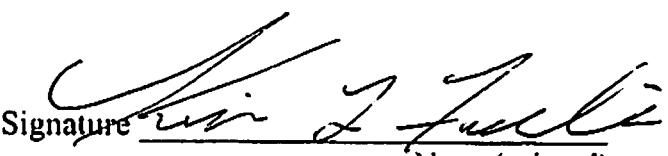
49. 2/28/2014 Told by Jane doc, because I was looking and investigating, the head of this organization wanted me dead, they were not coming to rob this time to kill me. I noticed on the schedule that no one was going to be at work other than me and Lawrence. At the end of Toshanda shift she left me stated " I got to go I have kids" tried to convince me to go along told her I would not go along. Left Antoinette took unscheduled 2 week leave of absence Rodney was off, Lawrence said he was in Carolina's , and would not be able to make it to work. I knew it was serious as Lawrence had sworn to protect me.

50. I was now alone and customers looked at me as if they were sad and knew my fate. The Line was growing. Someone called police told them there was fight in store. Lt Mills arrived when I told him I was alone his face turned red as he was telling me he was the only officer of command stature assigned that day. He was followed by Drake and Her partner who since I have been there never took a suspicious person report when I called. Higgins called me over to talk to me. He would not let me talk with Lt. Mills initially.

51. 3/1/2014 at approximately 5:00pm ,I told Lt Mills his officers were corrupt he said which ones. I said the two females one was Drake 2361 and her partner that was with her. Lt. Mills escorted me to the office his face red with anger he knew I was in trouble. I refused to quit and said I would not leave, Lt mills seemed very angry and just seemed to freeze as he began thinking. For whatever reason he did not refer me to his commander, But to internal affairs. He initially wanted me to call but then said no he would call and have Detective Jackson call me. Lt. Mills ordered an Asian officer to wait outside until I counted the money and put it in the safe.
52. When I came out to deposit the money I saw a White SUV with a black male on passenger side. The Asian officer had left after being ordered to stay. Then a white van with at least two to three individuals in it. Backed up into the driveway on the Essex side of Dollar General . I called my brother and was about to dial 911 and before I could hit the next I they began to pull out. Received call at about 6:06 pm on store phone . Individual stated " Just because you talk to mills you still are not safe", I really was not fully aware at the time and they just hung up and I can not with certainty say if the voice was male or female.
53. I got a dispatcher to call Lt mills and have him call me, I was reluctant to go to internal affairs as Jane Doe had warned me that the reason sometimes some trucks are late is to avoid the Dogs at the weigh station. Those who run the police force had people in the State police and Internal affairs and they are all on the payroll. I did not believe that until my internal affairs interview.
54. 3/5/2014 met with Jackson referred to Detective Christina Bartley: Office of Professional Responsibility Internal Affairs. Black male 6'3" did not introduce himself or shake my hand Detective Bartley did. The male did not nod through most of my statement and did not ask me any questions. He did not even want to shake my hand but I forced it on him and thanked him. Problem Detective Christina Bartley knew I had called numerous agencies and I never told her Mills or Jackson about this.
55. 3/6/2014 called back to speak with Detective Bartley, the women who answered the phone pretended to be detective Bartley she talked as if she was I asked her " If she was detective Bartley" she said yes the voice did not sound the same so I asked again and she asked where is this and who was I talking to earlier today. She acknowledged she was not Detective Bartley.
56. She asked for my name and phone number so that she could give to her I said that's OK. Called detective Jackson to give him my concern gave him date 3/6/2014 time 1:55pm and how long conversation lasted 1:55 seconds. He said I should calm down They ask me if I wanted to be notified when they obtain the videos from dollar general as they were going to get all the ones based on my call from dollar general and correlate it with video. I told them during the interview the moment Kevin knows you are coming the videos are trashed. They never called me back either. I am not aware of what is going on with them and despite that .

57. Sent Letter to the President of United States out of concern for his safety based on Jane Does comments made in section 45. I informed him of the situation and wanted him to stay clear for his own safety away from Richmond, until things got better.
58. Called Jennifer McClellan office, Maureen one of her assistants helped me in researching Article 1 of Virginia Constitution ,14th amendment and U.N. Declaration on human rights Article 3. I wanted to get a better feel of where the police actions stand constitutionally. They met the *prima facia* requirement needed to bring suit. I did not tell Maureen but told her boss that someone wanted me dead but did not go into any detail to protect her own safety she said thank you.
59. had learned from X that the police and gangs needed me dead asap and will do whats necessary to kill me. I presented this in front of City Council President Samuels as the City auditor suggested that I talk with him about commissions of data in the executive branch. I also did not reveal to him the full extent of my circumstances. This was my final stop. Could not see Jennifer McClellan or Governor so I went to City Council.
60. On 3/24/2014 I asked President Samuels what was the state of public safety in the city of Richmond Is the city complying with 14th amendment. I then publicly let him know someone in Mayors administration wanted to take my life were not honoring the my 14th amendment rights and those of the citizens in this city. He refuse to answer the question after repeated request.
61. As I wanted to file suit 3/25/2014 in John Marshall courts building I was told there was a general form to fill out. Went to clerk she said there was no forms like that in her office despite me seeing a 6'3" white male angry about filling out the very form I needed. There were 5 officers in the room and I could not afford to give them a reason ad I had planned for it as I knew most of the police were friends with certain clerks. Finding out which judge was going to be over there case. And how specific they would have to be. I immediately went to Richmond district court 4th division and filed this suit in order to right the wrongs and violations of my 14th amendment rights. I have no other remedies available to me. The only agency I have not contacted is the CIA. As this would be out of there domain. And would like to add as a side note to use Dollar General Trucks to transport up and down the east coast goods received from foreign sources has major national security implications.

62. I am asking this court to consider the facts and see that I have been denied 14th amendment rights guaranteed under the constitution as a result of actions of those within the administration of City of Richmond, Mayor Dwight C. Jones, Richmond Police, and failure of Oversight by City Council President Samuels and council itself. Wherefore the plaintiff demands judgment of \$1,000,000,000 against the defendants. For mental, physical and emotional trauma and damages and an immediate Investigation By the FBI gang unit and U.S. Attorney and such other relief as the courts seem just.

Signature 
Name(printed) Kim L Franklin
Address

Telephone number

804-321-6173